

REMARKS

In an Official Action dated April 16, 2004, the Examiner rejected the pending claims as obvious. The rejection of each claim is based at least in part on the combination of Sansone 5,008,827 and Sansone 5,925,864. The rejection of several of the claims also includes other additional prior art references. Applicants request that the Examiner reconsider the rejection in light of the following discussion. In addition, Applicants request that the Examiner favorably consider newly presented claims 29-49.

Applicants' mail processing system is directed to an automated system for preparing outgoing mail. The system is specifically designed for flexibility, accommodating a variety of different types of mail pieces and a wide variety of mailing applications. In short, the system can be operated to receive a batch of mail having varied shapes a sizes, and process the pieces so that they are ready to enter the postal system.

In contrast to Applicants' system, Sansone '827 is directed to a central communication system to connect various remote mail processing systems with a central U.S. Postal System computer. Specifically, Sansone '827 is directed to bulk mailing facilities that require regular certification of the machinery, as well as the ability to audit various information about the mail being processed. The communication system in Sansone '827 purportedly allows the postal service to inspect the machinery and audit information at a bulk mailing facility without needing to visit the facility. (See col. 5, lines 3-22).

Sansone '827 does not teach a labeler

The first shortcoming in Sansone '827 is that it does not teach or suggest a labeler as recited in Applicants' claim 1. The Examiner recognizes that this shortcoming, but attempts to fill this gap with the teaching of Sansone 5,925,864. The problem with the combination is that the combination ignores the function of the two

different systems.

Sansone '864 is directed to tracking metered mail based on information printed in the postage meter label so that the mail can be tracked. The information in the postage label is extracted and uploaded to a data base. When the recipient receives the mail, the recipient scans the postage labels by running the mail through a digital postage meter. The scanned information from the recipient is then uploaded to the central database and compared with the information from the mail that was sent. See col. 2 lines 11-40.

Sansone '864 mentions that the metered postage can be printed on a label and the label can be applied to the piece of mail. The problem with combining this features with Sansone '827 is that doing so ignores the fact that the Sansone '827 system is directed to bulk mailing items that do not use metered mail.

The whole point in Sansone '827 is to provide communication between bulk mail systems and postal facilities. Bulk mail does not get printed with a meter of postage. All of the mail is permit mail, meaning that the person sending the mail has a mail permit account number that is printed on the mail. The bulk mail is standardized mail. Since the mail is standardized, there is no need to incur the expense of a label for printing the permit stamp. When standardizing the mail, provision is made for the location of the permit stamp, and in a significant percentage of permit mail, the piece of mail is pre-printed with the permit stamp right on the document.

There simply is no motivation to add a labeler to the Sansone '827 device. Could it be added? Certainly. But the question is: why would someone add the labeler to the Sansone '827 system? And does that motivation come from something in Sansone '864 or Sansone '827? If not the addition of the pieces of the two Sansone references amounts to simply picking and choosing features and adding them together.

Sansone '827 does not teach a processor for determining the postage based on weight

The second shortcoming in Sansone '827 is that it does not teach or suggest a processor for determining the required postage based on the weight of a piece of mail. Sansone '827 identifies three relevant components:

- a scale unit 88 where the mailpiece is weighed (col. 11 lines 47-48)
- a metering station 90 for application of appropriate postage (col. 11 lines 48-49)
- a certification station where appropriate certification stamps may be placed on the mailpiece to indicate compliance of the mailpiece with all the criteria that have been set under work sharing requirements required under the U.S. Postal Service regulations (col. 11 lines 50-54)

Sansone does not state that the metering station applies appropriate postage based on the weight. It simply states that the piece is weighed and the postage is applied. Of course this make sense given the fact that Sansone '827 is a standardized bulk mail processing system. When determining the postage due for permit mail, the issue is whether the mail pieces are below a threshold weight and how many pieces are in a batch. Another issue relates to the fact that the pieces are supposed to be the same. By identifying the weight of a piece, and the overall weight of the batch of mail, the number of pieces can be determined.

Sansone '827 does not teach a printer operable to print the determined postage onto the label for a piece

The third shortcoming in Sansone '827 relates to both of the shortcoming discussed above. More specifically, as discussed above, Sansone '827 is directed to bulk mailing, which utilizes permit stamps for a standardized batch of mail. The same

permit is printed onto each piece in a batch regardless of the characteristics determined for each piece. Therefore, Sansone '827 does not teach or suggest a printer operable to print the postage that is determined based on the weight of a piece. Furthermore, claim 1 recites that the printer prints the postage onto a label, and as discussed above, Sansone '827 does not teach or suggest the use of a labeler.

Since Sansone '827 does not teach or suggest the features in claim 1, alone or in combination with Sansone '864, Applicants request that the Examiner reconsider the rejection of claim 1.

Furthermore, the Official Action does not address several of the features of dependent claims 2-12, and the features are neither taught nor suggested by the prior art of record.

With regard to claims 5-8, the Official Action simply states that some of the processed mail is rejected and other items are sent to the Postal system. Applicants' undersigned attorney is not sure what is meant by this, but presumes that the statement relates to some feature in Sansone '864. However, this general statement does not address the details of the features recited in these claims.

For instance, claim 5 recites an imaging computer that analyzes the image data using OCR to determine the address and Zipcode of the recipient and rejecting the piece if the determined address and Zipcode do not correlate. This is more specific than simply rejecting some pieces and sending the rest to the Postal service. The Official Action does not mention this feature, and it is not disclosed in the prior art of record.

Similarly, Claim 7 recites sorting the pieces into a number of bins in response to the determined address for the pieces. Again, this is quite different from

simply rejecting some pieces and sending the rest to the Postal service.

Again, claim 8 recites a reject bin for receiving pieces in which the recipient's address is not determined. Again, this is different from simply rejecting some pieces for some unknown reason.

Claim 9 recites a re-orientor operable to re-orient the mail as he feeder feeds the mail into the system transport. The Official Action cites York '392 as teaching that sometimes it is necessary to re-orient an item of mail. However, this broad statement of York ignores the difference between the system in York and the present apparatus. Specifically, York is directed to processing documents that have been extracted from incoming mail. York discusses how the documents should be selectively flipped around to put the documents into a uniform orientation (rightside up and front face forward) for further processing. The Official Action does not provide any mention of why someone would combine these features with the features of the outgoing mail system taught in Sansone '827, and clearly the reference do not provide any suggestion for such a combination.

Claim 10 recites that the system transport comprises a roller bed. There is no discussion of this feature in the Official Action and there is no teaching or suggestion of such a feature in the prior art of record.

Claim 11 recites a verifier for determining whether the postage was properly printed. The Official Action does not mention the verifier anywhere, and none of the prior art of record teaches or suggests a verifier. Further still, claim 12 recites that the verifier is a line scan camera. The Official Action cites Uno as teaching a line scan camera, but there is no mention of use of a line scan camera as a verifier.

Claim 13 is a method claim that recites the steps of labeling, determining

the appropriate postage based on the determined weight and printing the appropriate postage onto the label. These features are similar to the features discussed above in connection with claim 1. For reasons similar to those discussed above in connection with claim 1, claim 13 is patentably distinct from the prior art of record.

As with the dependent claims discussed above, several of dependent claims 13-18 have features that were not discussed in the Official Action and are not taught or suggested in the prior art. For instance, claim 16 recites sorting the piece according to the recipient's address. Also, claim 17 recites scanning the printed postage to verify that the postage was properly printed. Nothing in the prior art teaches such features.

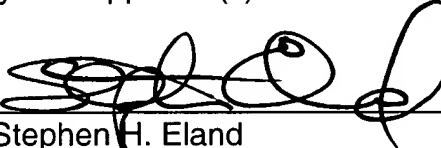
Based on the discussion above, Applicants request that the Examiner reconsider the rejection of independent claims 1 and 13, along with dependent claims 2-12 and 14-18. In addition, Applicants request that the Examiner favorably consider newly presented claims 29-49.

In light of the foregoing, Applicant believes that this application is in form for allowance. The Examiner is encouraged to contact Applicant's undersigned attorney if the Examiner believes that issues remain regarding the allowability of this application.

Respectfully submitted,

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By



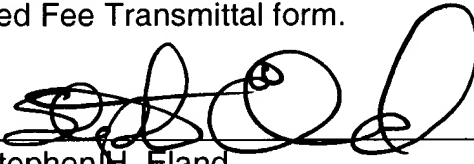
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Petition for Extension Under 37 CFR §1.136(a)

Applicant's undersigned Attorney hereby petitions for an extension of time of **THREE** months beyond the time period set in the last office communication. The proper fee is enclosed as identified in the enclosed Fee Transmittal form.

October 18, 2004
Date of Certificate



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